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December 31, 2020

VIA ECF

Honorable Robert W. Lehrburger
United States Magistrate Judge
United States Courthouse
500 Pearl Street, Room 1960
New York, NY 10007

Re: Mitsubishi Logistics Americas Corp. v. Ocean Network Express Pte. Ltd.
20 cv 06319 (GHW)

Honorable Sir:

We represent the plaintiff in this matter, Mitsubishi Logistics Americas Corp. This matter was filed and accepted by the court on October 22, 2020 as a related matter to The Matter of the Complaint of Hapag-Lloyd Aktiengesellschaft a/k/a Hapag-Lloyd AG 19-cv-05731 ((GHW)(hereinafter referred to as the "main action"). The Mitsubishi case arises out of the same incident as the main action (the fire on the Yantian Express), has legal and factual issues identical with those presented in the main action, and defendant Ocean Network Express is already a party to and involved in that action. Defendant's counsel joins in requesting that this matter be consolidated with the main action and that all scheduling deadlines be the same as in the main action.

In case it is still required, we are filing along with this letter Your Honor's completed Case Management Plan and Scheduling Order form. We and defendant's counsel apologize for the late submission of the case management plan, which simply resulted due to an oversight and the holidays.

Very truly yours,

/s/ Richard V. Singleton

Richard V. Singleton

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Page 2

cc: Lyons & Flood LLP
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